

LD

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

FILED

MAR 08 2010

MICHAEL KONZ, Clerk  
Dep. Clerk

CLIFFSTAR CORPORATION,

Case No. 09-CV-3867

Plaintiff,

Judge Legrome Davis

AJINOMOTO COMPANY, INC., ET AL.,

Defendants.

**JOINT STIPULATION FOR EXTENSION OF TIME TO MOVE, ANSWER OR  
OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

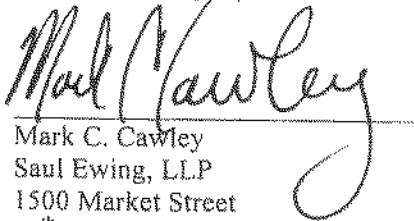
Counsel for Plaintiff and counsel for Defendants Ajinomoto U.S.A., Inc., Ajinomoto Food Ingredients LLC, Ajinomoto Switzerland, A.G. F/K/A NutraSweet A.G., J.W. Childs Associates L.P., Koninklijke DSM N.V., Monsanto Company, The NutraSweet Company, NutraSweet Property Holdings, Inc., and Tosoh Corporation (collectively, "Defendants") hereby stipulate that the date by which Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint in the above-captioned matter shall be extended as follows:

1. If the Court denies Defendants' Motion to Stay (Dkt 42), the date by which Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint shall be extended to thirty days after the date of the Court's ruling on Defendants' Motion to Stay. Defendants reserve their right to move the Court for additional time to respond to Plaintiff's Complaint, if necessary.
2. If the Court grants Defendants' Motion to Stay, Defendants' obligation to move, answer, or otherwise plead in response to Plaintiff's Complaint shall be stayed as per this Court's ruling. Upon expiration of the stay, the parties will promptly move the Court for entry of an

appropriate case management schedule, including a date by which Defendants must move, answer, or otherwise plead in response to Plaintiff's Complaint.

All defenses, including specifically the defense of lack of personal jurisdiction, are preserved.

Dated: February 23, 2010

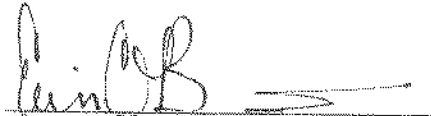


Mark C. Cawley  
Saul Ewing, LLP  
1500 Market Street  
38<sup>th</sup> Floor West  
Philadelphia, Pennsylvania 19102  
Tel: 215-972-7777  
Fax: 215-972-7725  
mcawley@saul.com

Michael R. Lazerwitz  
Patricia M. McDermott  
Cleary, Gottlieb, Steen & Hamilton LLP  
2000 Pennsylvania Avenue, N.W.  
Suite 9000  
Washington, District of Columbia 20006  
Tel: 202-974-1500  
Fax: 202-974-1999  
mlazerwitz@cgsh.com  
pmcdermott@cgsh.com

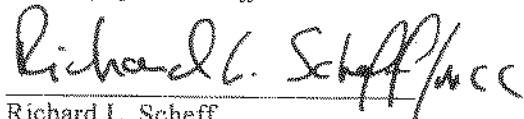
*Counsel for Defendants Ajinomoto U.S.A., Inc.,  
Ajinomoto Food Ingredients LLC, and Ajinomoto  
Switzerland A.G.*

Respectfully submitted,



Dianne M. Nast  
Erin C. Burns  
RODANAST, P.C.  
801 Estelle Drive  
Lancaster, Pennsylvania 17601  
Tel: 717-892-3000  
Fax: 717-892-1200  
dnast@rodanast.com  
eburns@rodanast.com

*Attorneys for Plaintiff*



Richard L. Scheff  
Lathrop B. Nelson, III  
Montgomery, McCracken, Walker  
& Rhoads, LLP  
123 South Broad Street  
Philadelphia, Pennsylvania 19109  
Tel: 215-772-1500  
Fax: 215-772-7620  
rscheff@mmwr.com  
lnelson@mmwr.com

Andrew S. Marovitz  
Britt M. Miller  
Mayer Brown LLP  
71 South Wacker Drive  
Chicago, Illinois 60606  
Tel: 312-782-0600  
Fax: 312-701-7711  
amarovitz@mayerbrown.com  
bmiller@mayerbrown.com

*Counsel for Defendant Koninklijke DSM N.V.*

*Carolyn H. Feeney/mcc*

Carolyn H. Feeney  
Dechert LLP  
2929 Arch Street  
Philadelphia, Pennsylvania 19104  
Tel: 215-994-4000  
Fax: 215-994-2222  
carolyn.feeney@dechert.com

David Marx, Jr.  
Amanda J. Metts  
Jennifer A. Smulin Diver  
McDermott Will & Emery, LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
Tel: 312-372-2000  
Fax: 312-984-7700  
dmarx@mwe.com  
ametts@mwe.com  
jddiver@mwe.com

*Counsel for Defendants J.W. Childs Associates L.P.,  
Monsanto Company, The NutraSweet Company,  
NutraSweet Property Holdings, Inc.*

*William H. Roberts/mcc*

William H. Roberts  
Jeremy A. Rist  
Blank Rome LLP  
One Logan Square  
130 North 18<sup>th</sup> Street  
Philadelphia, Pennsylvania 19103  
Tel: 215-569-5500  
Fax: 215-569-5555  
roberts@blankrome.com  
rist@blankrome.com

A. Paul Victor  
Jeffrey L. Kessler  
Aldo A. Badini  
Dewey & LeBoeuf LLP  
1301 Avenue of the Americas  
New York, New York 10019  
Tel: 212-259-8000  
Fax: 212-2599-6333  
pvictor@deweyleboeuf.com  
jkessler@deweyleboeuf.com  
abadini@deweyleboeuf.com

*Counsel for Defendant Tosoh Corporation*

ENTERED

MAR 08 2010

CLERK OF COURT

SO ORDERED

/S/LEGROME D. DAVIS